



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 15, 2022

Via ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Minh Quang Pham*
S1 12 Cr. 423 (RMB)**

Dear Judge Berman:

The parties write jointly pursuant to the Court's order, dated April 1, 2022 (D.E. 239), directing the parties to propose a schedule for the case going forward. The parties respectfully request that the Court schedule a status conference in this case for June 21, 22, or 24, 2022, as may be convenient for the Court, to discuss next steps in this matter. The parties also respectfully request that the proposed status conference proceed remotely by video. Because the defendant is currently housed at USP ADX Florence, in Colorado, conducting the conference by video will allow the proceeding to go forward without unnecessarily transporting the defendant back to a facility in the New York area, and the Court has been successfully able to hold previous conferences and arguments in this matter with the defendant's remote video participation from that facility.

The Government further requests, with the consent of defense counsel, that time be excluded in the interests of justice under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date set by the Court for the next conference, due to the complex nature of the prosecution in this case, to provide the defendant with additional time to review discovery and consider the need for any additional pretrial motions, and to allow the parties to discuss whether a potential resolution of this case is possible.

Respectfully submitted,

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Cc: Defense Counsel (via ECF)